

AGREEMENT

1. The parties to this Agreement are the United States, by the United States Attorney for the Western District of Missouri, and John Broman, Renee Broman and Sandra Broman (“the Claimants”), represented by Robin Fowler, (together “the Parties”).

2. The Parties stipulate that the Claimants filed claims in a nonjudicial administrative forfeiture proceeding with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) on November 10, 2020 to the following property (“the property”):

#	Description	Claimed by
1	Remington Arms Company, Inc. 11 Shotgun CAL:20 SN:1042260	1/3 interest by each of the three Claimants; owned by Family First, LLC ¹
2	Remington Arms Company, Inc. 11 Shotgun CAL:16 SN:1517079	1/3 interest by each of the three Claimants; owned by Family First, LLC
3	Remington Arms Company, Inc. 11 Shotgun CAL:12 SN:93925	1/3 interest by each of the three Claimants; owned by Family First, LLC
4	Meridian Firearms Co. Unknown Shotgun CAL:12 SN:74869	1/3 interest by each of the three Claimants; owned by Family First, LLC
5	Unknown Unknown Shotgun CAL:12 SN:34402	1/3 interest by each of the three Claimants; owned by Family First, LLC
6	IJA & CWKS Target Sealed 8 Revolver CAL:22 SN:N14288	1/3 interest by each of the three Claimants; owned by Family First, LLC
7	Remington Arms Company, Inc. 512 Rifle CAL:22 SN:None	1/3 interest by each of the three Claimants; owned by Family First, LLC

¹ Family First, LLC was doing business as 4 Bears Den gun store pursuant to Federal Firearms License (FFL) number 5-43-185-01-2M-13808.

8	Colt Unknown Revolver CAL:44-40 SN:297190	1/3 interest by each of the three Claimants; owned by Family First, LLC
9	Doubletap Defense, LLC Unknown Pistol CAL:45 SN:DA13452	1/3 interest by each of the three Claimants; owned by Family First, LLC
10	Kahr Arms - Auto Ordnance PM9 Pistol CAL:9 SN:1B3030	1/3 interest by each of the three Claimants; owned by Family First, LLC
11	Remington Arms Company, Inc. R51 Pistol CAL:9 SN:H010863R51	1/3 interest by each of the three Claimants; owned by Family First, LLC
12	Taurus International PT709 Pistol CAL:9 SN:TJU05936	1/3 interest by each of the three Claimants; owned by Family First, LLC
13	Smith & Wesson Pistol CAL 40 SN: FBE9101	1/3 interest by each of the three Claimants; owned by Family First, LLC
14	Smith & Wesson 442-1 Revolver CAL:38 SN:DMY5458	1/3 interest by each of the three Claimants; owned by Family First, LLC
15	Smith & Wesson 442-1 Revolver CAL:38 SN:DMZ8606	1/3 interest by each of the three Claimants; owned by Family First, LLC
16	Smith & Wesson M&P M2.0 Pistol CAL:40 SN:NBX4035	1/3 interest by each of the three Claimants; owned by Family First, LLC
17	Smith & Wesson 1442-1 Revolver CAL:38 SN:DMY5480	1/3 interest by each of the three Claimants; owned by Family First, LLC
18	Smith & Wesson SD40 Pistol CAL:40 SN:FBH1038	1/3 interest by each of the three Claimants; owned by Family First, LLC
19	Remington Arms Company, Inc. R51 Pistol CAL:9 SN:H010839R51	1/3 interest by each of the three Claimants; owned by Family First, LLC
20	Sig-Sauer P238 Pistol CAL:380 SN:27A025251	John Broman
21	Remington Arms Company, Inc. 1911 Pistol CAL:45 SN:2397506	John Broman
22	Thompson/Center Arms Co. Herrett Pistol CAL:357 SN:184198	John Broman

23	Winchester 94 Rifle CAL:30-30 SN:L53595	John Broman
24	Winchester 1966 Centennial Rifle CAL:30-30 SN:48366	John Broman
25	Browning 81BLR Rifle CAL:7 SN:11237NZ327	John Broman
26	Winchester 1906 Rifle CAL:22 SN:375736	John Broman
27	Browning BPS Shotgun CAL:12 SN:34645MM121	John Broman
28	Winchester 88 Rifle CAL:308 SN:H252529	John Broman
29	Remington Arms Company, Inc. MP12 Rifle CAL:22 SN:199993	John Broman
30	Springfield Firearms Corporation 83 Rifle CAL:22 SN:None	John Broman
31	Browning 8 Rifle CAL:22 SN:5T20075	John Broman
32	Winchester 06 Rifle CAL:22 SN:765603	John Broman
33	Remington Arms Company, Inc. 550-1 Rifle CAL:22 SN:None	John Broman
34	Winchester 50 Shotgun CAL:20 SN:147223	John Broman
35	Henry Repeating Rifle Company Unknown Rifle CAL:22 SN:T36063H	John Broman
36	Marlin Firearms Co. 1894CB Rifle CAL:45 SN:04040787	John Broman
37	Remington Arms Company, Inc. 760 Rifle CAL:30-06 SN:534395	John Broman
38	U.S.A. Military Surplus 1903 Rifle CAL:30-06 SN:375710	John Broman
39	Norinco (North China Industries) SKS Rifle CAL:762 SN:526924	John Broman
40	Universal Firearms Corp. M1 Rifle CAL:30 SN:383511	John Broman
41	DPMS Inc. (Defense Procurement Mfg. Services) A15 Rifle CAL:223 SN:F213755	John Broman
42	Olympic Arms Inc (SGW Enterprises & Safari Arms) PCR-99 Rifle CAL:223 SN:9610	John Broman
43	Savage Axis Rifle CAL:22 SN:1556082	John Broman

44	Anderson Manufacturing AM-15 Rifle CAL:Multi SN:19339205	John Broman
45	Winchester 70 Rifle CAL:308 SN:G3032503	John Broman
46	Taurus International Unknown Revolver CAL:327 SN:CR53492	John Broman
47	U.S.A. Military Surplus 1917 Rifle CAL:30-06 SN:1213370	John Broman
48	Winchester 1400 Shotgun CAL:12 SN:195441	John Broman
49	Ruger LCP Pistol CAL:380 SN:371855914	Renee Broman
50	Auto Ordnance West Hurley, NY Unknown Rifle CAL:Unknown SN:KT1341	Renee Broman
51	High Standard Derringer Pistol CAL:22 SN:2468732	Renee Broman
52	Fie Titan Pistol CAL:25 SN:A56644	Renee Broman
53	Colt 01-091 Pistol CAL:45 SN:CU38184	Renee Broman
54	Bersa Thunder 380 Pistol CAL:380 SN:H31095	Renee Broman
55	Remington Arms Company, Inc. 1100 Shotgun CAL:20 SN:L973606K	Sandra Broman
56	Mossberg 500 Shotgun CAL:410 SN:U371755	Sandra Broman
57	Ithaca Gun Co. 37R Shotgun CAL:12 SN:1849982	Sandra Broman
58	Winchester 1400 Shotgun CAL:12 SN:N466651L	Sandra Broman
59	Stoeger Arms 3000 Shotgun CAL:12 SN:1418912	Sandra Broman
60	Ithaca Gun Co. 37 Shotgun CAL:20 SN:1032472	Sandra Broman
61	Ithaca Gun Co. 37 Shotgun CAL:16 SN:365376	Sandra Broman
62	Remington Arms Company, Inc. 16 Rifle CAL:22 SN:423977	Sandra Broman

3. The Parties stipulate that, under 18 U.S.C. § 983(a)(3)(A)-(C), the deadline for the United States to file a complaint for forfeiture against the property

and/or to obtain an indictment alleging that the property is subject to forfeiture currently is February 8, 2021.

4. As provided in 18 U.S.C. § 983(a)(3)(A), the Parties agree to extend the time in which the United States is required to initiate judicial forfeiture alleging that the property is subject to forfeiture, in order that the Parties may have a reasonable and sufficient period in which to evaluate their respective interests in and positions regarding the property.

5. The Claimants knowingly, intelligently and voluntarily give up any right they may have under 18 U.S.C. § 983(a)(3)(A)-(C) to require the United States to initiate judicial forfeiture by February 8, 2021 and any right they may have to seek dismissal judicial forfeiture on the ground that it was not filed or returned on or before February 8, 2021.

6. The Parties agree that the deadline by which the United States shall be required to initiate judicial forfeiture shall be extended from February 8, 2021 up to and including March 8, 2021.

7. The Claimants agree that until the United States files a complaint for forfeiture against the property and/or obtains an indictment alleging that the property is subject to forfeiture initiates judicial forfeiture or until March 8, 2021, whichever occurs first, the property shall remain in the custody of the United States and the Claimants shall not seek its return for any reason in any manner.

8. The Parties agree to execute and file the attached Joint Motion to Extend Time To Initiate Judicial Forfeiture.

Timothy A. Garrison
United States Attorney

02/05/2021
Date

/s/ Mary Kate Butterfield
Mary Kate Butterfield
Assistant United States Attorney

2/5/21
Date

/s/ Robin Fowler
Robin Fowler
Counsel for Claimants